

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>TARA CAPPS, as administrator of the</b>	)	
<b>ESTATE OF MARK CAPPS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>No. 3:23-cv-01141</b>
<b>v.</b>	)	
	)	<b>Judge Crenshaw</b>
<b>METROPOLITAN GOVERNMENT OF</b>	)	<b>Magistrate Judge Newbern</b>
<b>NASHVILLE AND DAVIDSON</b>	)	
<b>COUNTY, <i>et al.</i>,</b>	)	<b>JURY DEMAND</b>
	)	
<b>Defendants.</b>	)	

**UNOPPOSED MOTION TO EXTEND SCHEDULING DEADLINES**

Pursuant to Local Rule 7.01 and Federal Rule of Civil Procedure 6(b), Defendants Metropolitan Government of Nashville & Davidson County, Tennessee and Sgt. Ashley Coon (“Metro Defendants”) jointly move for an extension of the following deadlines as stated in the Case Management Order (Doc. 88).

<u><b>Current Deadlines</b></u>	<u><b>Proposed Amended Deadlines</b></u>
Depose Plaintiff, Mollie Acuff, and Noah Silva: March 1, 2025	Depose Plaintiff, Mollie Acuff, and Noah Silva: April 17, 2025

All other deadlines in this case have been reserved pending Sgt. Coon’s motion for summary judgment and will not be impacted by granting the requested extension.

Metro Nashville served discovery requests on Plaintiff, Tara Capps on December 17, 2024. Because of the holidays and other case commitments, Plaintiff requested an extension on written discovery. In light of the extension that Metro Nashville granted, the parties have not yet set a date for the depositions to take place. The parties agree that the deposition deadline should be extended to allow Metro Nashville sufficient time to review Mrs. Capps’s

discovery responses before the deposition deadline expires.

This extension will not delay this case because Sgt. Coon's summary judgment motion remains pending and there is not a trial date set.

Respectfully submitted,

DEPARTMENT OF LAW OF THE  
METROPOLITAN GOVERNMENT OF  
NASHVILLE AND DAVIDSON COUNTY  
WALLACE W. DIETZ (#9949)  
DIRECTOR OF LAW

*/s/ Melissa Roberge*  
MELISSA ROBERGE (#26230)  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing has been served via email to:

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on this 21st day of February 2025.

*/s/ Melissa Roberge*  
Melissa Roberge